

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

BRENDAN GAYTAN, §  
TDCJ-CID No. 01985534, §  
Petitioner, §  
v. § Civil Action No. 2:19-CV-316  
§  
BOBBY LUMPKIN, Director, §  
Texas Department of Criminal Justice, §  
Correctional Institutions Division, §  
Respondent. §

**RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL  
FOR THE DIRECTOR WITH BRIEF IN SUPPORT**

The Director was last represented in this cause by Assistant Attorney General Jon Meador. Since that time, it has become necessary to reassign this case to the undersigned Assistant Attorney General. As a result, the undersigned moves this Court to allow Mr. Meador to withdraw and to permit the undersigned to substitute in as the Assistant Attorney General representing the Director in this federal habeas action.

The undersigned has been licensed to practice in the State of Texas since November 3, 2017, and is a member in good standing of the State Bar of Texas. The undersigned is also admitted to practice in the United States District Court for the Southern District of Texas. All future correspondence should be sent to the same address at the undersigned's attention.

For the foregoing reasons, the undersigned moves this Court to allow Assistant Attorney General Jon Meador to withdraw and to substitute the

undersigned as the Assistant Attorney General to represent the Director in this federal habeas corpus action.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

JOSH RENO  
Deputy Attorney General for  
Criminal Justice

EDWARD L. MARSHALL  
Chief, Criminal Appeals Division

\*Lead Counsel

s/ Patrick D. Todd  
PATRICK D. TODD\*  
Assistant Attorney General  
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ATTORNEYS FOR RESPONDENT

## CERTIFICATE OF CONFERENCE

The Director has conferred with Gaytan through his counsel of record and he does not oppose this substitution.

s/ Patrick D. Todd  
PATRICK D. TODD  
Assistant Attorney General

## CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing on January 15, 2021 with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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s/ Patrick D. Todd  
PATRICK D. TODD  
Assistant Attorney General